Cross-Border Acknowledgment III: The Crossword of PIPER — Passive Oversight and the Institutionalization of Inaction

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Administrative Court Case: 7. Kpk.. 750.239/2025/2
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Abstract

This sequel describes a time when multiple oversight bodies **recognized** a protected disclosure of educational obstruction but did not take **any apparent corrective action**. Hungary's accreditation agency (**MAB**) confirmed docketing for the upcoming **WFME/ESG** cycle **(**Reg. nr **MAB/477/2025**), while the Ombudsman (**EBF–AJBH–309–2025**), the **Administrative Court (7.Kpk. 750.239/2025/2**), and the **Data Protection Authority** NAIH **(**J-427-3/2025) received complaints regarding access denial, inconsistent application of **CV/FM rules**, and a **public SharePoint/Neptun linkage**. Within days of these disclosures, the university issued a **dean-signed takedown notice demand**ing the removal of legally published research **within three days**, **without** citing any statute, regulation, or internal policy.

We name this regulatory phenotype **PIPER (*Passive Institutional Perceptive Engagement Record*)**: **awareness without action** that converts rights claims into inert metadata. Grounded in **Act CCIV/2011**, **Act CL/2016**, **Act XXV/2023**, the **EU Charter** (Arts. 21, 41, 47), and **ESG** (1.3/1.4/1.6), the analysis argues that acknowledgment without enforcement **fails the duty of effective remedy**, mainly where the underlying restriction rests on **unwritten** access conditions that conflict with the text of the **SZMSZ** (Arts. **5**, **11**, **23(3)**, **24(1)**, **29**). The paper proposes time-bound follow-up, retaliation-trigger notation, and accessible service channels as practical QA reforms.

Keywords

Whistleblower protection; administrative obstruction; WFME; ESG; effective remedy; EU Charter; higher education law; QA compliance; CV/FM; Semmelweis University; Ombudsman; NAIH. Keywords: PIPER; ESG/WFME accreditation; whistleblower protection; Act XXV/2023; EU Charter Arts 41 & 47; administrative obstruction; Semmelweis University; MAB; ECFMG; FAIMER; retaliation in higher education. JEL: I23, I28, K23, K42.

GDPR & Evidence Handling. All third-party personal data are minimized and pseudonymized. Where necessary, exhibits are redacted (names, IDs, faces) and reproduced only in short, necessary excerpts for scholarly analysis. Legal basis: legitimate interests in public-interest reporting and research; for the author, protected disclosure under Act XXV/2023.

Full exhibits are **on file with the author** and may be shared for bona fide scholarly/QA review, subject to GDPR and whistleblower-protection constraints.

Education Law & Policy eJournal
Administrative Law eJournal
EU Law & Regulation eJournal
Legal Education eJournal / Higher Education eJournal
Regulation & Regulatory Governance eJournal

Author Role & Funding. Independent working paper; no external funding; the author is the complainant in the referenced matters.
Conflicts. None beyond the procedural posture disclosed herein.
Data Availability. Index of exhibits (MAB acknowledgment; Ombudsman service correspondence; NAIH filing; dean's takedown letter) available on request, subject to GDPR and whistleblower-protection rules.

1. Introduction

Cross-Border Acknowledgment I demonstrated that the case had reached ***WFME, ECFMG, FAIMER, and Irish DFHEARIS channels***. The present installment examines the afterlife of recognition: formal visibility without intervention. On ***July 5, 2025****, the Ombudsman opened a file* ***(EBF–AJBH–309–2025),*** *and the* ***Budapest Administrative Court transmitted the petition (7. Kpk . 750.239/2025/2)*** to the University for a response. In parallel, the ***National Authority for Data Protection and Freedom of Information (NAIH)*** docketed a related ***whistleblower/data-protection filing (J-427-3/2025)***. In early September, the ***Hungarian Accreditation Committee (MAB)*** confirmed that Semmelweis's compliance with relevant standards would be evaluated during the forthcoming institutional and ***WFME medical accreditation procedures*** (***Reg. nr: MAB/477-4/2025)***. Within days around those milestones, the University issued a dean-signed ***notice demanding removal of the whistleblower's research*** from **ResearchGate** and other ***platforms within three days***—without citing a lawful basis. This juxtaposition—oversight awareness alongside retaliatory pressure—poses the central question: what happens when accountability is replaced by archiving?

2. Chronology of Institutional Awareness (June–November 2025)

Date	Authority	Action	Effect
June–July 2025	Ombudsman (EBF–AJBH–309–2025)	Investigation initiated; later notices via post; service issues risk procedural termination	Formal case record established but vulnerable to service technicalities
July 2025	Budapest Administrative Court (7.Kpk.750.239/2025/2)	Petition registered and transmitted to University	Judicial review opened
Aug 17, 2025	NAIH (J-427-3/2025)	Whistleblower/data-	Privacy/retaliation

		protection complaint docketed	vector documented
Oct 14–15, 2025	Semmelweis University	Dean's takedown notice demanding removal of research, 3-day deadline, no legal basis cited	Retaliation event
Sept 2–3, 2025 (and continuing) **October 30 2025 Reply for the retaliation**	Hungarian Accreditation Committee (MAB)	Acknowledgment: materials will be evaluated in forthcoming institutional/WFME procedures (Reg. nr: MAB/477-4/2025)	Official awareness within QA cycle; no visible remedial action to date

3. The PIPER Model

Definition: ***Passive Institutional Perceptive Engagement Record (PIPER)*** is a regulatory phenotype consisting of five stages: (**1) Perception (intake)**, **(2) Acknowledgment (receipt)**, (**3) Non-Intervention (no measures), (4) Procedural Closure (archiving over remedy)**, and (5) **Normalization (recurrence treated as due process). In this model, (1)–(2) are evidenced by MAB and Ombudsman records;** (3)–(4) are indicated by reliance on postal service defects and the absence of corrective steps; and (5) is shown by the persistence of unresolved access/assessment issues alongside takedown threats.

4. Legal and QA Framework

Hungarian law: Act CCIV of 2011 (equal access, transparency); Act CL of 2016 (lawful, predictable, and fair procedure); Act XXV of 2023 (whistleblower protection and anti-retaliation). *EU Charter: Article 21 (non-discrimination*), Article 41 (right to good administration), and Article 47 (effective remedy). QA Standards: ESG 1.3/1.4/1.6 require fair assessment, dependable complaint pathways, and adequate resources; WFME standards require transparency, non-discrimination, and accountability across medical training. When acknowledgment substitutes for remedy—especially amid documented retaliation—these standards are implicated.

5. Evidence of Retaliation and Oversight Silence

On ***October 14–15, 2025***, a *dean-signed notice ordered* the removal of the author's research outputs from *ResearchGate and other platforms* within three days, without citing a legal basis. The notice arrived shortly after NAIH correspondence and while ***MAB confirmed the QA docket***. The timing and content suggest retaliation under ***Act XXV/2023***. No public remedial action by an authority has been recorded since, illustrating the PIPER dynamic: knowledge without enforcement.

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- Exhibit 1: Dean's formal notice (Oct 14–15, 2025) — removal demand within 3 days; no legal basis cited.

83099-16/A0ADH|2025
SEMMELWEIS EGYETEM
ÁLTALÁNOS ORVOSTUDOMÁNYI KAR
SE11723033
FACULTAS MEDICE
• 1769
FININON
Dékán
PROF. DR. NYIRÁDY PÉTER
Siddhartha Harsh Wardhan
To: Siddhartha Harsh Wardhan
hallgato
student
részére
NEPTUN kód: AXEMG8
küldve: e-mailen és postán (tértivevényes!)
e-mail: siddhartha.harsh@stud.semmelweis.hu
swardhan@icloud.com
Neptun code: AXEMG8
Sent: by e-mail and by post (with return receipt)
és E-mail: siddhartha.harsh@stud.semmelweis.hu and
swardhan1@icloud.com
levelezési cim: 1094 Budapest, Tüzoltó utca 37-47., EOK
Notification address: 1094 Budapest, Tüzoltó utca 37-47., EOK
Könyvtár
Library
Tárgy: felszólitás https://www.researchgate.net/searchés Subject: Formal notice requesting to remove studies uploaded
egyéb közösségi hálózatokra é s felületekre feltöltött to
https://www.researchgate.net/search and other social
tanulmányok eltávolítására networks and platforms
Dear Student,
1, the undersigned, Prof. Dr. Péter Nyirády, Dean of the Faculty
o f Medicine at Semmelweis University (1085 Budapest, Üllöi ú t
26.)
Tisztelt Hallgato!
Alulírott Prof. Dr. Nyirády Péter, a Semmelweis Egyetem (1085
Budapest, Üllöi út 26.) Általános Orvostudományi Karának
dékánjaként
felszólítom
hogy az Ön által a https://www.researchgate.net/search
(a továbbiakban: portál) oldalra, továbbá más
internetes és tartalommegosztó felületekre feltöltött a
Semmelweis Egyetem oktatási tevékenységével

kapcsolatos, személyiségi jogainak megsértésére
alkalmas tanulmanyokat, anyagokat jelen levelem
kézhezvételét követö 3 napon belül a portálról
hianytalanul távolítsa el,
hogy a jövöben tartózkodjék a Semmelweis Egyetem
személyiségi jogait, jó hirnevét sértö magatartástól.
hereby issue a formal notice requiring you to:
Remove in their entirety, within three (3) days of receipt
https://www.researchgate.net/search (hereinafter: "the
portal") or to any other online o r content-sharing
platform,
which are capable of infringing upon
Semmelweis University's o r any individual's personal
rights.
You are further directed to refrain from any future conduct
that may violate Semmelweis University's personal rights
or harm its reputation.
Prof. Dr. Alpár Alán, a Semmelweis Egyetem nemzetközi
képzésekért felelös rektorhelyettesének tájékoztatása
alapján tudomásomra jutott, hogy Ön, aki a Semmelweis
Egyetem hallgatója, föként a portálon, de más internetes
felületeken is olyan tanulmánvokat (közöttük bonctermi
fotókat) töltött fel - és ezáltan hozott a széles nyilvánosság
tudomására -, mely tanulmányok a Semmelweis Egyetemen
According to information provided by Prof. Dr. Alán Alpár, Vice-
Rector for International Studies, i t has come t o my attention
that you, as a student of Semmelweis University, have
uploaded t o the portal and other online platforms certain
materials (including anatomy-lab photographs and related
EGYETEM 1769
Cim: 1085 Budapest, Üllöi ú t 26
Postacím: 1085 Budapest, Ullöi út 26.; 1428 Budapest, Pf. 2 .
E-mail: tit
Tel.: (+36-1) 317-9057
semmelweis.hu/aok

6. Discussion: Oversight as Data, Not Justice

When protected disclosures are integrated into ***QA pipelines*** but lack time-bound measures, oversight becomes more archival than remedial. In such conditions, the risk of retaliation increases (as threats shift to publication takedowns), and trust in quality assurance diminishes. In medical education, passive oversight undermines public accountability related to ***WFME recognition and ECFMG pathways***, and discourages future whistleblowing, which is essential for system integrity.

7. Policy Recommendations

- **Time-bound follow-up:** QA bodies should publish a 90-day status update after acknowledging protected disclosures.
- Retaliation triggers: Any post-submission takedown or disciplinary notice should automatically escalate to external review and pause adverse institutional actions pending an independent check.
- PIPER registry: ESG/WFME partners should monitor PIPER events as risk indicators for targeted audits.
- Service access: Ombudsman and QA officials should utilize English e-channels where feasible, reducing procedural closures due to service defects.

8. Conclusion

The ***MAB acknowledgment*** proves that awareness exists; the takedown notice proves that retaliation can co-exist with that awareness; and the absence of visible remedial action proves **PIPER—Passive Institutional Perceptive Engagement Record**—is operative. Without converting acknowledgment into enforcement, EU-aligned protections risk becoming promises recorded rather than rights realized.

Exhibits Index

- Exhibit 2: MAB Secretariat acknowledgment (Reg. nr: MAB/477-4/2025; Sept 2–3, 2025) — confirms evaluation during forthcoming institutional/WFME procedures.
Information Submission – Whistleblower Case and Possible Retaliation at Semmelweis University

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From: Siddhartha HARSH WARDHAN siddhartha.harsh@stud.semmelweis.hu To: titkarsag@mab.hu
Date: Wed, Oct 15, 2025, 6:09 PM

Formal_Notice_Siddhartha_Harsh_Wardhan_83099-16_AOADH_2025.pdf 310 KB Re: 83099-16:AOADH:2025 Formal notice requesting to remove studies uploaded to https:www.researchgate.net:search and other social networks and platforms .pdf 83 KB

Dear Members of the Hungarian Accreditation Committee,
I am a full-time medical student (Neptun AXEMG8) at Semmelweis University and the complainant in an active case before the Office of the Commissioner for Fundamental Rights (Case EBF–AJBH–309–2025) and the Budapest Administrative Court (Case 7.Kpk.750.239/2025/2).
My published research papers—documenting educational and resource deficiencies—have recently prompted a formal takedown demand from the University (Ref. 83099-16/AOADH/2025). The notice contains no legal citation or evidence of misconduct but threatens disciplinary action for portraying the University "in a negative light."
I recognize that MAB does not intervene in individual disciplinary cases. I am submitting this information purely for transparency, as the matter concerns the academic governance and quality-assurance environment at an accredited institution.
Attached are:

The formal takedown notice (13 Oct 2025), and
My written response asserting academic and whistleblower protections (15 Oct 2025).
I kindly request that this correspondence be acknowledged as part of MAB's institutional-quality monitoring record for Semmelweis University.
Respectfully,
Siddhartha Harsh Wardhan
Medical Student – EM14, Faculty of Medicine
Semmelweis University

Dékån

7769

83093-ÅG/AOÆDH/202c
SEMMELWEIS EGYETEM
ÅLTALÅNOS
ORVOSTUDOMÅNYI KAR

PROF. DR. NYIRÅDY pÉTER

levelezési cim: 1094 Budapest, TÜzoltÖ utca 37-47., EOK Könyvtår

Tärgy: felszölitäs https://www.researchgate.net/search és egyéb közösségi hälözatokra és felületekre feltöltött tanulmänyok eltävolitäsära

Tisztelt Hallgatö!

Alulirott Prof. Dr. Nyirädy Péter, a Semmelweis Egyetem (1085 Budapest, Üllöi üt 26.) Åltalånos Orvostudomånyi Karänak dékänjaként felszölitom

- hogy az ön åltal a https://www.researchgate.net/search (a továbbiakban: portäl) oldalra, továbbå mäs internetes és tartalommegosztö felületekre feltöttött a Semmelweis Egyetem oktatäsi tevékenységével kapcsolatos, személyiségi jogainak megsértésére alkalmas tanulmänyokat, anyagokat jelen levelem kézhezvételét követÖ 3 napon belül a portälröl

To: Siddhartha Harsh Wardhan student

Neptun code: AXEMG8

Sent: by e-mail and by post (with return receipt)

E-mail:siddhartha.harsh@stud.semmelweis.hu and swardhanl@icloud.com

Notification address: 1094 Budapest, TÜzoltÖ utca 37-47., EOK Library

Subject: Formal notice requesting to remove studies uploaded to https://www.researchgate.net/search and other social networks and platforms

Dear Student,

l, the undersigned, Prof. Dr. Péter Nyirädy, Dean of the Faculty of Medicine at Semmelweis University (1085 Budapest, Üllöi üt 26.) hereby issue a formal notice requiring you to:

- Remove in their entirety, within three (3) days of receipt of this letter, all studies, materials, and other content related to Semmelweis University's educational activities that you have uploaded to https://www.researchgate.net/search (hereinafter. "the portal") or to any other online or content-sharing platform, which are capable of infringing upon

hiánvtalanul távolitsa el.

Exhibit 3: NAIH whistleblower/data-protection filing (August 17, 2025; Case J-427-3/2025) — SharePoint/Neptun exposure of names, Neptun IDs, and status.
Kísérőlevél — NAIH részére (ajánlott, tértivevényes)

Címzett:
Nemzeti Adatvédelmi és Információszabadság Hatóság (NAIH)
Székhely: 1055 Budapest, Falk Miksa utca 9–11.
Levelezési cím: 1363 Budapest, Pf. 9.

Feladó:
Siddhartha Harsh Wardhan
Cím: 1056 Budapest, Belgrád rakpart 4. Fsz. 4
E-mail: siddhartha.harsh@stud.semmelweis.hu
Proton: student.rights34@proton.me

Tárgy: J-427-3/2025 – Kiegészítő beadvány; egyetemi felszólító/„fenyegető" levél és bizonyítékok iktatása
Hivatkozás: NAIH e-mailes tájékoztatás 2025.10.10. (tárgy: „JOG/427-3/2025")
Kelt: Budapest, 2025. október 28.

Tisztelt Hatóság!

Ezúton papíralapon nyújtok be kiegészítést a J-427-3/2025 számú ügyben. A NAIH 2025.10.10-i e-mailes tájékoztatását követően a Semmelweis Egyetem felszólító (retorzió-gyanús) levelet küldött részemre a kutatási/nyilvános dokumentumaim eltávolítására. Kérem, hogy az alábbi mellékleteket iktassák az ügy irataihoz, és a vizsgálat során értékeljék, hogy a felszólítás összefüggésben áll-e az általam 2025.08.17-én tett adatvédelmi bejelentéssel (hallgatói név + Neptun + tanulmányi előrehaladás összekapcsolása és közzététele).

Kérem, hogy az eljárás további lépéseiről és esetleges hiánypótlásról írásban tájékoztatni szíveskedjenek. Kapcsolattartásra a fenti egyetemi és Proton e-mail címem egyaránt megadható.

Tisztelettel,

_____
Siddhartha Harsh Wardhan

Mellékletek (Exhibits):

Exhibit NAIH-1: NAIH Ügyfélszolgálat e-mailje 2025.10.10., tárgy: „JOG/427-3/2025” (nyomtatott példány + csatolt hivatalos levél).
Exhibit NAIH-2: Egyetemi felszólító/„fenyegető” levél (2025.10.14–15.) + boríték/feladóvevény fotó (ha van).
Exhibit NAIH-3: Eredeti adatvédelmi bejelentés és kiegészítő dokumentáció (2025.08.17–18.).
Opcionális háttér: Ombudsman-ügy kivonata (EBF–AJBH–309–2025) és a Mellékletek A–F jegyzéke.
Boríték kitöltése — rövid emlékeztető

• Jobb alsó (Címzett): NAIH – 1055 Budapest, Falk Miksa u. 9–11. (vagy levelezési cím: 1363 Budapest, Pf. 9.)
• Bal felső (Feladó): Siddhartha Harsh Wardhan, 1056 Budapest, Belgrád rakpart 4. Fsz. 4
• Jelölés: kézzel írd rá — „Ajánlott – Tértivevényes”. A postán kérd a tértivevény kartont és őrizd meg az RA azonosítót.

English Cover Note (Optional to Include)
Subject: Case J-427-3/2025 — Supplemental filing; university takedown/retaliation notice enclosed

Dear Authority,

I hereby submit, in hard copy, the university’s takedown/“threat” letter and supporting evidence to be docketed to Case J-427-3/2025. Please treat this as a potential act of retaliation, occurring shortly after your October 10, 2025 email notice (subject: “JOG/427-3/2025”) and my Ombudsman communications. Kindly confirm docketing and advise of any deficiencies.

Sincerely,

_____
Siddhartha Harsh Wardhan
Email: siddhartha.harsh@stud.semmelweis.hu | Proton: student.rights34@proton.me

- Exhibit 4: Ombudsman correspondence (Sept–Oct 2025; EBF–AJBH–309–2025) — service/termination exchange and request for e-channel use.

Subject: Re: Information
Date: Wednesday, October 1, 2025, at 1:52:21 AM Central European Summer Time
From: Siddhartha HARSH WARDHAN
To: To: To: To: Egyenlő Bánásmód
Attachments: Attachments: Attachments: Attachments: image002.png
Dear Commissioner,
Re: Case No. EBF–AJBH–309–2025
I respectfully submit this addendum for inclusion in my case file to address procedural fairness concerns.
On 6 August 2025, I attended a meeting with your office regarding my complaint. Since that date, I have never received an email, phone call, or any notice informing me that an official ruling had been sent by post. On 4
In September 2025, the document was returned as "not claimed" to your office. I was unaware that a ruling had been mailed, and therefore, I could not take steps to collect it. I ask that this be recognised as a procedural disadvantage not caused by me.
I again request that my official correspondence address also include my University address:
1094 Budapest, Tűzoltó utca 37–47, EOK Library (Semmelweis University).
This will ensure I receive and respond to your letters. I will also continue to file my materials through Ügyfélkapu / E-papír to comply with procedural requirements.
I am not seeking to embarrass or pressure your office. However, Hungary has committed itself under Act CL of 2016
1 of 4(Administrative Procedure Act) and Act CCIV of 2011 (National Higher Education Act) to principles of transparency, predictability, and equal treatment. These principles also bind the Ombudsman when handling discrimination complaints.
Because the same **Directorate-General that defends Hungary's Universities in EU funding matters is now tasked with investigating my**
In this case, there is an appearance of a conflict of interest. This makes it especially important that my complaint be handled transparently and, on its merits, so that there can be no perception of bias or quiet termination.
For the record, my complaint is already a matter of public and academic record:
My case study papers have been distributed on SSRN and placed me in the top 10 % of 2.4 million authors globally.
Three papers—**Denied Access to the Scalpel for Dissecting the Specimen, Gatekeeper of Rights, and Educational Rights and Whistleblower Protection in Hungarian Medical Education—**have been archived in the Florida State University Law Library and other U.S. law libraries.
Administrative Obstruction in EU Medical Education: A Legal Case

Study from Semmelweis University is my most widely read paper.
On 28 July 2025 the Hungarian Accreditation Committee (MAB) confirmed receipt of my appendices (Reg. nr: MAB/477-4/2025) for review during its forthcoming WFME accreditation cycle.
This means my case cannot simply be "hidden" or "closed quietly"; it is already preserved internationally and will remain accessible to regulators and researchers.
2 of 4I therefore respectfully request that your Directorate:
1. 2. 3. Confirm in writing that my case will be investigated on the merits under Act CL/2016 and Act CCIV/2011, notwithstanding any external funding disputes.
Confirm that my correspondence address has been updated as above to prevent further missed notices.
Ensure all rulings and procedural steps are communicated to me in advance by at least email or E-papír as well as by post.
Thank you for your attention and for upholding the Ombudsman's role as an Independent safeguard of educational rights.
Sincerely,
Siddhartha Harsh Wardhan
siddhartha.harsh@stud.semmelweis.hu
+36 70 350 4077
Get Outlook for iOS

From: Egyenlő Bánásmód <egyenlobanasmod@ajbh.hu>
Sent: Tuesday, September 30, 2025 4:20:31 PM
To: Siddhartha HARSH WARDHAN <siddhartha.harsh@stud.semmelweis.hu>
Subject: InformaRon
Reference number: EBF-AJBH-309- 26 /2025.
Administrator: Molnár Veronika
3 of 4**Subject: Information**
Siddhartha Harsh Wardhan
siddhartha.harsh@stud.semmelweis.hu
Dear Mr Wardhan,
With reference to your e-mail of 26 September, 2025 we inform you of the following.
The Commissioner for Fundamental Rights (hereinafter: Authority) issued a ruling calling to remedy the
deficiencies of your complaint which was sent to your registered address (1056 Budapest, Belgrád rakpart
2. fszt. 4. a.) on 15, August 2025. On 4 September, 2025, the document was returned to the Authority by
the postal service as 'not claimed'. Without you complying with the ruling, the Authority cannot proceed
with the investigation of your complaint and the procedure has to be terminated. In order to provide you

with another opportunity to comply with the ruling we have posted it to your address a second time. The
documents of the case otherwise comprise your submissions only.
Please note that the Authority does not conduct official correspondence with clients in ongoing cases via
email, emails are used to provide information only. If you want to send your submissions to the Authority
electronically, you need to do so via the electronic mailing system Ügyfélkapu (https://ugyfelkapu.gov.hu/) and avail of the application E-papír (https://epapir.gov.hu/). Unless you
contact the Authority through Ügyfélkapu, the Authority continues sending official documents to you by
regular mail.
Yours faithfully,
Molnár Veronika
Head of Department
Department for Equal Treatment
Directorate-General for Equal Treatment
Office of the Commissioner for Fundamental Rights of Hungary
4 of 4

GDPR & Evidence Handling. All third-party personal data are minimized and pseudonymized. Where necessary, exhibits are redacted (names, IDs, faces) and reproduced only in short, necessary excerpts for scholarly analysis. Legal basis: legitimate interests in public-interest reporting and research; for the author, protected disclosure under Act XXV/2023.

References

- Hungarian Accreditation Committee (MAB) — Secretariat correspondence Reg. nr: MAB/477-4/2025 (Sept 2–3, 2025).
- Semmelweis University — Dean's takedown/notice (Oct 14–15, 2025).
- NAIH — Whistleblower/Data-Protection filing (August 17, 2025; J-427-3/2025).
- Ombudsman — EBF–AJBH–309–2025 (Sept–Oct 2025 service correspondence).
- Legal instruments: Act CCIV/2011; Act CL/2016; Act XXV/2023; Charter of Fundamental Rights of the EU (Arts. 21, 41, 47); ESG/WFME standards.

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